

D- hold until trial

 - Need pretrial ruling

A- has agent on pretrial ruling

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISIONUnited States Courts
Southern District of Texas
FILED

SEP 23 2019

David J. Bradley, Clerk of Court

VS.

DAVID KEITH WILLS

§
§
§
§
§

CASE NO. 2:17-CR-390

DEFENDANT'S AMENDED EXHIBIT LIST FOR TRIAL

Exhibit No.	Description	Offer:	Admitted:	Not Accepted	Offer of Proof
1	7 th Grade Attendance Reports L.S. DKW:0000001- DKW:0000005	OBJ			W/D
2	Grade 7 Grades L.S. DKW:0000006- DKW:0000007	OBJ			W/D
3	L.S. Student Incident Reports DKW:0000008- DKW:00000011	OBJ			W/D
4	BISD Gifted and Talented Student Performance Record 2012-2013 L.S. DKW:00000037- DKW:00000043	OBJ			W/D
5	BISD Gifted and Talented Student Performance Record 2011-2012 L.S. DKW:00000044- DKW:00000047	OBJ			W/D
6	BISD Gifted and Talented Student Performance Record 2010-2011 L.S. DKW:00000048- DKW:00000051	OBJ			W/D
7	Galaxy Program Academic Acceptance Form L.S.	OBJ			W/D

	DKW:00000052- DKW:00000057	OBJ		
8	BISD Gifted and Talented Student Performance Record 2009-2010 L.S. DKW:00000058- DKW:00000061	OBJ		wlo
9	Oliveria Middle School Student Release form '14-'15 L.S. DKW:00000062- DKW:00000065	OBJ		wlo
10	Valley Regional Medical Center Medication Center UTI L.S. DKW:00000096- DKW:000000108	OBJ		
11	Valle/Villarreal Dental Center L.S. DKW:000000109- DKW:000000120	OBJ		wlo
12	Invoices to Washington D.C. Trip DKW:000000122- DKW:000000133	OBJ	pre admit	
13	People to People Correspondence DKW:000000134- DKW:000000137	OBJ	pre admit	
14	8/22/12 Thurber Visit DKW:000000140- DKW:000000142	OBJ		wlo
15	2/18/13 Thurber Visit DKW:000000143- DKW:000000146	OBJ		wlo
16	5/6/13 Thurber Visit DKW:000000147- DKW:000000148	OBJ		wlo
17	8/12/13 Thurber Visit DKW:000000149- DKW:000000151	OBJ		wlo
18	8/27/13 Thurber Visit DKW:000000152- DKW:000000156	OBJ		wlo
19	1/7/14 Thurber Visit DKW:000000157- DKW:000000159	OBJ		wlo

	2/13/14 Thurber Visit DKW:000000160- DKW:000000164	OBJ		W/D
20	4/16/14 Thurber Visit DKW:000000165- DKW:000000167	OBJ		W/D
21	6/27/14 Thurber Visit DKW:000000168- DKW:000000173	OBJ		W/D
22	8/4/14 Thurber Visit DKW:000000174- DKW:000000175	OBJ		W/D
23	7/8/14 Thurber Visit DKW:000000176- DKW:000000178	OBJ		W/D
24	8/7/14 Thurber Visit DKW:000000179- DKW:000000181	OBJ		W/D
25	8/11/14 Thurber Visit DKW:000000182- DKW:000000184	OBJ		W/D
26	8/20/14 Thurber Visit DKW:000000185- DKW:000000187	OBJ		W/D
27	8/27/14 Thurber Visit DKW:000000188- DKW:000000190	OBJ		W/D
28	11/10/14 Thurber Visit DKW:000000191- DKW:000000193	OBJ		W/D
29	11/22/14 Thurber Visit DKW:000000194- DKW:000000196	OBJ		W/D
30	2/13/15 Thurber Visit DKW:000000197- DKW:000000201	OBJ		W/D
31	2/18/15 Thurber Visit DKW:000000202- DKW:000000204	OBJ		W/D
32	3/3/15 Thurber Visit DKW:000000205- DKW:000000207	OBJ		W/D
33	Quest Diagnostics Urine test L.S. DKW:000000208- DKW:000000214	OBJ		W/D
34				

May Shouldate

	3/22/14 Days Inn Folio DKW:000000246	OBJ		Wb
35	4/11/14 Days Inn Folio DKW:000000247	OBJ		Wb
36	6/6/14 Days Inn Folio DKW:000000248	OBJ		Wb
37	6/29/14 Days Inn Folio DKW:000000249	OBJ		Wb
38	7/25/14 Days Inn Folio DKW:000000250	OBJ		Wb
39	9/17/14 Days Inn Folio DKW:000000251	OBJ		Wb
40	10/25/14 Days Inn Folio DKW:000000252	OBJ		Wb
41	12/31/14 Days Inn Folio DKW:000000253	OBJ		Wb
42	Cameron County Family Violence Task Force Report DKW:000000507- DKW:000000512	OBJ <i>not go to JuV</i>		Wb
43	Tx DPS Family Violence Report DKW:000000513- DKW:000000514	OBJ <i>not go to JuV</i>		Wb
44	Tx DPS Sexual Assault Report DKW:000000515- DKW:000000516	OBJ <i>not go to JuV</i>		Wb
45	BPD Submission Form DKW:000000534	OBJ <i>not go to JuV</i>		Wb
46	BPD Release of Property 4- 16-15 iPhone 5s DKW:000000588	OBJ	pre admit	
47	BPD Release of Property 4- 14-15 DKW:000000589	OBJ	pre admit	
48	4-22-15 BPD Receipt of Evidence Property iPhone 5s DKW:000000590	OBJ	pre admit	
49	4-22-15 BPD Receipt of Evidence Property DKW:000000591	OBJ	pre admit	
50	4-16-15 BPD Receipt of Evidence Property iPhone 5s DKW:000000592	OBJ	pre admit	
51				

may stipulate

	5-6-15 BPD Receipt of Evidence Property DKW:000000593	OBJ	<i>p/c Admit</i>	
52	5-6-15 BPD Receipt of Evidence Property DKW:000000594	OBJ		WD
53	Intake Report Child Protective Services DKW:000000678- DKW:000000681	OBJ		WB
54	DFPS Contact Log Narrative DKW:000000682- DKW:000000685	OBJ		WLO
55	DFPS Intake Report DKW:000000686- DKW:000000694	OBJ		WD
56	Hudson Elementary Student Release Log 2012/2013 DKW:000000701- DKW:000000712	OBJ	Summaries are okay <i>Sust obj to highlights & notes</i>	
57	Hudson Elementary Student Release Log 2011/2012 DKW:000000713- DKW:000000720	OBJ	Summaries are okay <i>Sust obj to highlights & notes</i>	
58	Oliveria Middle Student Release Form 2013-2014 DKW:000000721- DKW:000000722	OBJ	Summaries are okay <i>Sust obj to highlights & notes</i>	
59	Oliveria Middle Student Release Form 2014-2015 DKW:000000723- DKW:000000726	OBJ	Summaries are okay <i>Sust obj to highlights & notes</i>	
60	Grade Report Oliveria Middle School L.S. DKW:000000732- DKW:000000733	OBJ		WD
61	Grade Report Hudson Elementary L.S. DKW:000000738	OBJ		WD
62	GJ Subpoena return BISD DKW:000000774- DKW:000000782	OBJ	Summaries are okay <i>Sust obj to highlights & notes</i>	
63	South Texas Eye Center Records DKW:000000793- DKW:000000875	OBJ	<i>p/c Admit</i>	
64	The Children's Doctor Records	OBJ	<i>p/c Admit</i>	
65				

	DKW:000000876- DKW:000000959			
66A	Wells Fargo Records Losoya DKW:0000001215- DKW:0000001981	OBJ	to be replaced w/ b6A pre admkt	
67a1	Sarita Checkpoint Data and Car Photos DKW:0000002314- DKW:0000002323	OBJ	10-H-9	
68	DFPS Table of Contents DKW:0000002324- DKW:0000002327	OBJ		WD
69	DFPS Case File Cover Sheet and Case Event List DKW:0000002328- DKW:0000002364	OBJ		WD
70	DFPS External Documents (Redacted) WITHDRAWN	OBJ		WD
70a	CPS Records	OBJ		
70b	CPS Photos CPS Intake Report (Redacted)	OBJ		WD
71	CPS Notification to Law Enforcement Agency of Abuse/Neglect Report DKW:0000002375- DKW:0000002381	OBJ		WD
72	CPS Application for Emergency Assistance DKW:0000002382- DKW:0000002383	OBJ		WD
73	CPS Services and Referrals Checklist Report DKW:0000002384- DKW:0000002385	OBJ		WD
74	CPS Risk Assessment Report DKW:0000002386- DKW:0000002392	OBJ		WD
75	CPS Investigation Summary for Maria Losoya DKW:0000002393- DKW:0000002399	OBJ		WD

	CPS History of Investigation for Maria Losoya DKW:0000002400	OBJ		WD
77	CPS Family Service Plan Evaluation DKW:0000002401- DKW:0000002405	OBJ		WD
78	CPS Conservatorship Removal DKW:0000002406	OBJ		WD
79	Redacted CPS Records WITHDRAWN	OBJ		WD
80	Permanency Conference Notes DKW:0000002429- DKW:0000002431	OBJ		WD
81	CPS Redacted Documents WITHDRAWN	OBJ		WD
82	Contact Log Narrative DKW:0000002618 DKW:0000002626	OBJ		WD
83	CPS Redacted Documents Cont'd WITHDRAWN	OBJ		WD
84	Vehicle Information - 2005 BMW DKW:0000003086- DKW:0000003088	OBJ		WD
85	Vehicle Information - 2009 Lexus DKW:0000003089	OBJ		WD
86	4200 Las Palmas Records with Affidavit DKW:0000003116- DKW:0000003129	OBJ		
87	506 Lakewood Property Records with Affidavit DKW:0000003130- DKW:0000003265	OBJ		WD
88	SANE Records with Affidavit DKW:0000003270- DKW:0000003344	OBJ	<i>pre adm't</i>	
89	Records for 210 Oak Bay #402 in Rockport with Affidavit DKW:0000003398- DKW:0000003418	OBJ	<i>pre adm't</i>	
92				

93	Omni Hotel Receipt with Business Records Affidavit DKW:0000003419- DKW:0000003420	OBJ OVR	pre admit		
94	GBT Port Isabel Lease Agreement 11820 Parklawn Dr., Ste. 204 with Affidavit DKW:0000003421- DKW:0000003440		pre admit		
95	GBT Port Isabel Settlement Statement 503 Southpoint Dr. with Affidavit DKW:0000003441- DKW:0000003497		pre admit		
96	HUD Settlement Statement 2207 Cape McCann in Rockport with Affidavit DKW:0000003498- DKW:0000003501		pre admit		
97	Records for 110 Villa Doce with Affidavit DKW:0000003502- DKW:0000003517	OBJ			
98	M&T Bank Records 2011-2015 David Wills DKW:0000003518- DKW:0000003558	OBJ			WD
99	Eye Institute of Corpus Christi Records for DKW DKW:0000003559- DKW:0000003575	OBJ Subject to hearsay	10-4-19		
100	Starbucks Store Locations and Corresponding Store Numbers DKW:0000003576- DKW:0000003584	OBJ			
101	Richard Losoya Blue Federal Credit Union Records DKW:0000003585- DKW:0000004082	OBJ			WD
102	Richard Losoya Bank of America Records DKW:0000004083- DKW:0000004236	OBJ			WD
103	National Protocol for Sexual Assault Medical Forensic Examination	OBJ		Does not go to jury	

	DKW:0000004237- DKW:0000004614				
104	Losoya Sprint Records DKW:0000004934- DKW:0000005378				WD
105	Losoya Jail Calls DKW:0000005379- DKW:0000005397	OBJ			
106	Randy Moore Recorded Statement DKW:0000005560	OBJ			WD
107	Randy Moore Affidavit DKW:0000005398- DKW:0000005405	OBJ			WD
108	Randy Moore Drawing DKW:0000005406- DKW:0000005407	OBJ			
109	Nicholas Stambaugh Bank Records DKW:0000005408- DKW:0000005521	OBJ	pre adm't		
110	Jane Doe Social Media Posts DKW:0000005522- DKW:0000005559	OBJ			
111	Signed Nunez Stipulation DKW:0000005561- DKW:0000005565	OBJ	SUST.		
112	Photos of Apple Desktop Computer turned over by Defense DKW:0000005566- DKW:0000005569	OBJ			
113	Photo of two GBT Shrimp DKW:0000005570	OBJ	demonstrative only		
114	Photo of GBT Assembly Line DKW:0000005571	OBJ	demonstrative only		
115	Photo of GBT Shrimp DKW:0000005572	OBJ	demonstrative only		
116	Photos of Water Levels at GBT Shrimp Farm Rockport DKW:0000005573- DKW:0000005575	OBJ			
117	Aquaculture Magazine Article on GBT DKW:0000005576- DKW:0000005581	OBJ	DVS 10/4/19		

	Photos of Valley Baptist Medical Center Colposcope DKW:0000005582- DKW:0000005584		<i>pre admit</i>		
118	David Wills Blog DKW:0000005585- DKW:0000005952	OBJ			
119	Photo of David Wills Genital Area DKW:0000005953		<i>pre admit</i>		
120	Photos of David Wills Scar on Abdomen DKW:0000005954- DKW:0000005955		<i>pre admit</i> <i>pre admit</i>		
121	Border Crossing Photo of F-150 DKW:0000005956	OBJ			
122	Border Crossing Photo of BMW DKW:0000005957	OBJ			
123	Sarah Baker text to David Wills DKW:0000005958	OBJ			
124	Photo of the Kids DKW:0000005959	OBJ	10/4/19		
125	Photos of GBT Apple Laptop DKW:0000005960- DKW:0000005961	OBJ			
126	Article and Photo of Sonja Eddleman using colposcope DKW:0000005962- DKW:0000005967	OBJ	<i>pre admit</i>		
127	GBT Port Isabel Demolition Contract DKW:0000005968	OBJ			
128	GBT Port Isabel Lease Payments DKW:0000005969	OBJ			
129	Miguel Angel Uresti W9 DKW:0000005970	OBJ			
130	Online Omni Hotel Photographs from Website DKW:0000005971- DKW:0000005972	OBJ	9/25/19		
131	April 13, 2015 Video		<i>pre admit</i>		
132	April 13, 2015 Video		<i>pre admit</i>		
133	April 13, 2015 Video		<i>pre admit</i>		
134	April 13, 2015 Video		<i>pre admit</i>		

Respectfully Submitted,

By: /s/ Cynthia E. Orr
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**Lead Counsel*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been electronically delivered to Assistant United States Attorney Zahra Fenelon, as a registered participant to the CM/ECF document filing system, and by email to Zahra.fenelon@usdoj.gov on this the 26th day of August 2019.

By: /s/ Cynthia E. Orr
Cynthia E. Orr

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID WILLS,

Defendant.

Criminal Action No:
2:17-CR-390

Defendant's supplemental witness list

Number	Description	Offer	Admitted	Offer of Proof
135	Phone Extraction (5000+pg) (full record from			
135.2	GE 65 photo		10-3-19	
136	Omni Hotel Records		9-25-19	
137	Rolex Records			
138	Days Inn Hotel Photos			
139	Omni Hotel Photos			
140	GBT Business Location Photos			
140.1, 140.2			demonstrative only	
141	AT&T Records			
142	Video of Nora Archer by Lucio on 4/23/15			
143	Audio of Lucio Phone Call w/ Ivan Castro on 4/13/15			
144	Audio of Lucio Phone Call w/ Randy Moore			
145	Video of Lucio Interview w/ school counselor Vidaurri 4/8/15			
146	Losoya Video Interview – 2/10/17			

147	Losoya Video Interview – 7/21/17			
148	Losoya Video Interview – 8/1/17			
149	Losoya Video Interview – 4/9/15			
150	Losoya Video Interview – 4/23/15			
151	Audio Recording of Maria Losoya Jail Phone Calls			
151A				
152	Odom Interviews with Sara Baker-Benz on 8/1/19			
153	Lucio Video Interview of Gaspar Garcia 4/13/15			
154	Lucio Video Interview of Richard Losoya 4/23/15			
155	Lucio Video Interview of Elizabeth de la Garza 4/10/15			
156	Nunez Webpage 09242018		9-26-19	
157	HSI Subpoena – Sprint		9-26-19	
158	GBT Photo			
159	GBT Photo		demonstrative only	
160	GBT Photo		demonstrative only	
161	GBT Photo		demonstrative only	
162	GBT Photo		demonstrative only	
163	GBT Photo		demonstrative only	
164	Photo of Employees of GBT		demonstrative only	

165	Photo of Employees of GBT		demonstrative only
166	TKS Group Letter		demonstrative only
167	Photo of Laurie White Wills	Obj sust.	demonstrative only
168	Family Photo with Laurie, DKW and Stephen	Obj Sust.	
169	DKW Check to Candy Losoya \$325 July 12, 2012		
170	Losoya \$800 Check March 10, 2015		
171	Stripes Gas Receipt – Brownsville		
172	Omni Email – Stephen White		
173	Mike Uresti Checks and Emails		
174	Artisanal Meme		
175	Transcript of CAC interview		
176	Intentionally skipped		
177	One page of transcript of CAC interview re: JD has two phones		
178	Omni Hotel PMS record		9-25-19
179	Schlitterbahn Scott Friedman Receipt		
180	Docket Attorney General (Maria Losoya v. BART		
181			
182			9-26-19
183			demonstrative only
184			9-26-19
185			
186			9-26-19
187			
188			

189		9-27-19	
190		9-27-19	
191	Relacked CPS records	9-27-19	
192		9-27-19	
193	hot to vary		
194	photo-bar	10-2-19	
195	Bus-Rec. Affidavit	10-1-19	
196			
197			
198	Aug 1 report	demonstrative only	
199		9-30-19	
200			
201			
202			
203		demonstrative only	
204		demonstrative only	
205		demonstrative only	
206	Photos - Madeira	10-2-19	
207	Jewelry Repair photos	10-2-19	
208			
209			
210	Serial # - Laptop	10-1-19	
211		10-2-19	
212			
213	Minor Report	demonstrative only	
214			
215		10-3-19	
216		10-3-19	
217		10-3-19	
218		10-3-19	
217.1		10-3-19	
217.2		10-3-19	
219			
220			
221			
222			
223			

224.1		10-4-19		
224.2		10-4-19		
224.3		10-4-19		

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**Lead Counsel*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been electronically delivered to Assistant United States Attorney Zahra Fenelon, as a registered participant to the CM/ECF document filing system, on this the 26th day of September 2019.

By: /s/ Abasi D. Major
Abasi D. Major